



# KERALA PRIVATE COLLEGE MANagements' ASSOCIATION

(Registered under Travancore-Cochin Literary Scientific & Charitable Societies' Registration Act XII of 1955 Reg.S.No.Tr.12 of 1960, 03-05-1960)

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KPCMA/WLC-1/2022

08-06-2022

To

The Chairman,  
Higher Education Committee for College Teachers' Workload Assessment

Sir,

Sub: Submitting suggestions and opinions on College Teachers' Workload  
Assessment- regarding.

Ref: 1.G.O No.629/2022/HEDN Thiruvananthapuram dated 04-05-2022

2.Letter No.1/2022/4 dated 02-06-2022 of Higher Education Committee  
for College Teachers' Workload Assessment

With reference to the above we are submitting herewith our views and  
suggestions on various terms of references of the above mentioned Committee,  
for kind consideration.

Thanking you,

Your's faithfully,

Dr.M.Usman

(General Secretary)



Encl: As above

# KERALA PRIVATE COLLEGE MANAGERMENTS' ASSOCIATION

(Regd No.Reg.S.No.Tr.12 of 1960)

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## Views and suggestions on various terms of references of the Higher Education Committee for College Teachers' Workload Assessment

1. അദ്ധ്യാപക തസ്തികകളിലെ നിയമനത്തിന് 01-06-2020 മുതൽ പി.ജി. വെയിറ്റ്റ് ഇല്ലാതെ 16 മണിക്കൂർ ജോലിഭാരം നിർബന്ധമാക്കിയ നിബന്ധന ഉന്നത വിദ്യാഭ്യാസ മേഖലയിൽ എന്തൊക്കെ പ്രത്യാഘാതങ്ങൾ ആണ് സൃഷ്ടിച്ചിട്ടുള്ളത് ?

As per G.O(Ms)No.155/2020/HEDN dated, 01/04/2020 Government has revised the norms for fixing the workload of teaching posts in the Arts & Science Colleges of the state by incorporating the following criteria:

- In all Aided Arts & Science Colleges in the State, workload of 16 hours per week is required for sanctioning and filling up of regular teaching posts. No regular teaching post will be allowed for a workload of less than 16 hours, even if it is a single faculty subject. Service of Guest lecturer alone will be permitted for subjects with a workload of less than 16 hours.*
- It is also ordered that existing teachers whose appointments have already been approved will not be terminated on this account, even if they have less than 16 hours of workload now. The posts existing with less than 16 hours of workload will vanish away on the retirement/resignation/relieving of the present teacher or occurrence of vacancy in any other manner. No Manager is permitted to fill up any teaching post which carries less than 16 hours of workload.*
- PG weightage will not be considered since it is not provided under UGC Regulations.*

The Kerala Private College Management Association submitted a detailed ten points memorandum to the Hon.ble Chief Minister of Kerala to do the needful for repealing the above G.O with immediate effect pointing out the unlawful nature and





far reaching adverse consequences of it (No:KPCMA/CM-1/2020 dated 03-04-2020) with copies to the Hon.ble Minister for Higher Education, Govt. of Kerala, Hon.ble Minister for Finance, Govt. of Kerala and the Principal Secretary, Department of Higher Education, Govt. of Kerala. But the Govt. did not give any positive response. We continued our efforts by submitting our grievances at different levels, but in vain.

**We hereby submit a few important adverse consequences of taking away PG weightage in the calculation of workload of college teachers.**

- A. Removing PG weightage without any amendments of University Statutes is a violation of existing norms related to calculation of workload of teaching staff in the Arts & Science Colleges and Arabic Colleges affiliated to various Universities of Kerala. Fixation of workload is a prerogative of the affiliating universities which came into being on the basis of University Acts passed by legislature. An executive order intervening in this is unlawful.
- B. Removing PG weightage will have far reaching adverse consequences on the quality of higher education in the state besides leading to the loss of nearly 2000 existing teaching posts in the colleges by rendering these posts as supernumerary. The Kerala Private College Management Association conducted a survey in 120 aided colleges affiliated to the universities of Kerala, M.G, Calicut and Kannur on the immediate impact of the Govt. decision. The survey was conducted in April/May 2020 with the support of the Council of Principals of Colleges in Kerala, a registered organization of the Principals of aided colleges of Kerala. The survey revealed that removing PG weightage will result in rendering 1263 teaching posts in 120 colleges supernumerary. It may be noted that the survey covered only 71% of the aided colleges.

C. Removing PG weightage has resulted in an unprecedented crisis in the Arts & Science Colleges of the State. Many of the colleges had initiated the process of recruitment of teachers, anticipating retirement of teachers from Post Graduate Departments and single faculty Departments so as to ensure continuity of academic activities without interruption. The new decision resulted in permanently vanishing of these posts. The G.O has specified that the modified criteria of workload will come into force with effect from 09/05/2018. There are many appointments of teachers already



made after 09/05/2018 but pending approval by the Universities. In some colleges the Managements are unable to appoint from the existing rank list in the retirement posts which has vanished with this GO. A large number of Guest Lecturers were also appointed in PG departments of colleges after 09/05/2018 reckoning PG weightage and remunerations were disbursed to them accordingly. There is no way to get back the amount disbursed in this manner. All these have created unprecedented crisis in this sector, besides demoralising the existing teachers in PG Departments and single faculty Departments of colleges whose posts are rendered supernumerary with removal of PG weightage.

D. The Arts & Science colleges constitute the most important segment of higher education in Kerala. There are 229 Arts & Science Colleges in the state comprising of 163 private aided and 66 Govt. colleges (Economic Review, Kerala State Planning Board 2021). There are nearly 800 Post Graduate courses (including those in Arabic Colleges) offered in these colleges. The total student enrolment in the P.G Courses in the Govt. and Aided Colleges of Kerala is 44,160, of which 64.6% are girls in MA Courses, 63% are girls in M.Sc Courses and 69.7% are girls in M.Com (Economic Review 2021). Thus the P.G Courses of colleges are instruments of social advancement and women empowerment which are the characteristics, among other things, of the celebrated Kerala Model of Development. Removing PG weightage has created an atmosphere of uncertainty and arbitrariness in the PG Departments of affiliated colleges.

2. ജോലിഭാരം കണക്കാക്കുമ്പോൾ പി.ജി. അധ്യാപനത്തിന് നൽകി വന്നിരുന്ന വെയിറ്റ്റ്ജ് ഒഴിവാക്കിയ തീരുമാനം ഭാവിയിൽ പി.ജി. അധ്യാപനത്തിന്റെ ഗുണമേന്മയെ പ്രതികൂലമായി ബാധിക്കുമോ?

Removing PG weightage will adversely impact on the overall quality of higher education in Kerala at the levels of UG, PG and Research as explained below:

A. The teaching learning process at the Post Graduate level is different from that in Under Graduate level in content, methodology and learning outcome. A Bachelor's Degree usually provides a bird's eye view of the subject and the related fields one selects. Its main objective is to open up awareness of further possibilities with regard to the subject concerned.





On the other hand, Post Graduation, within the broader scenario of higher education, is identified and realized as an arena of specialized learning. Students and teachers are expected to dwell deep into the intricacies of the concerned subject. Post graduation needs to be research oriented and also tends to equip students with critical thinking, logical reasoning and skill development which would naturally pave the way for the creation of new knowledge.

It is not an easy task to address the above mentioned purposes of post graduate learning from within the set pattern of general distribution of workload. A teacher engaging a post graduate class is bound to work round the clock not just to prepare for his or her classroom lectures, but also in updating oneself, to engage in research and related academic activities and also in guiding the students to do the same within and outside the classroom. The teacher needs to take extra efforts to provide theoretical and practical exposure to the students to create in them an attitude of research and self learning.

The syllabus prescribed for the PG course is just a pointer to a wider world of knowledge to be unearthed. The curriculum also provides open ended possibilities to nourish and develop the potentials of the students. A teacher engaging a postgraduate class has the duty to guide them and open up the knowledge stream that stretches beyond the prescribed syllabus. The effort a teacher takes to engage a postgraduate class is thus double or multiple in the light of prior preparation and the general updating of the subject. The efforts to inculcate research aptitude among students are also equally time consuming.

The extra efforts a teacher is bound to take to perform his/her duties along with the regular mode of academic time schedule definitely need extra credit. The continuous vigil and performance of the teacher to impart the prescribed syllabus, prepare students for exams even while encouraging them to tread beyond the syllabus and to nourish in them a sense of enquiry and research won't contain within the generalized pattern of distribution of hours. It demands much more



acknowledgement which could be justified by sufficing extra credits of 1:1.5 to the prescribed hour.

The above mentioned facts point to the implementation of this policy by our Universities for nearly four decades. The various academic bodies like Board of Studies, Faculty, and Academic Council have planned and implemented the curriculum transaction taking into consideration of extra efforts the teachers have to take while taking PG classes. The Higher Education Department of the Government of Kerala had also accepted this pattern and sanctioned posts to Govt. and aided colleges taking into consideration of the above facts.

The following points may also be considered while looking into the difference between PG and UG teaching.

- a) In UG, the project work can be done as group project while in PG individual project requires one mentor per student. All universities assign at least 4 credits to Project/Dissertation prepared by P.G students under the supervision of one faculty member.
- b) PG teaching involves and requires micro level in depth learning before teaching rather than UG.
- c) More advanced text books, reference books and journals need to be referred to PG teaching.
- d) Students need to be trained more exhaustively for PG.
- e) At present P.G course are run in four semesters which requires constant supervision and continued assessment of students.
- f) In most of the colleges, the P.G Students are given special orientation training for UGC NET examination by the teachers of concerned Departments.

B. The PG Departments of many of the colleges in Kerala are approved Research Centres offering Ph.D programmes in various subjects. Many of the teachers of these Departments are Research Supervisors also,





along with discharging their normal duties in the college. Taking away the weightage of PG courses will lead to difficulties for these teachers to find time to supervise research scholars effectively, besides discharging the normal teaching and co curricular duties. All these will lead to a general decline of academic standards.

C. Removing P.G weightage will adversely affect the quality of teaching at U.G level also. With the removal of P.G weightage the existing teachers of the Department will have to bear the burden of teaching at the levels of both U.G and P.G. Teachers engaging PG classes have to put in extra efforts to maintain quality as described above. They will have only lesser time to take care of their UG students as the existing teachers share the responsibilities at these two levels. Thus it will lead to a simultaneous decline of standards of teaching at both UG and PG levels.

D. The long term impact of removing P.G weightage on the quality of teaching and/ teachers of Kerala also need elaboration. It is the highly meritorious students of PG courses who enter into teaching profession at various levels, after acquiring requisite qualifications. The present move will adversely affect the quality of our future teachers also. The Ministry of Higher Education and University Grants Commission has been taking steps to attract best talents to the teaching profession. Taking away the weightage for PG courses in calculation of workload will lead to a steep decline in the number of teaching posts available in our colleges in the near future. There are nearly 800 PG courses offered in more than 220 PG colleges in the state. The total number of teaching posts that will turn supernumerary will be around 2000. This will lead not only to a decline in academic standards of our PG courses, but also will result in a dearth of teachers for conducting various academic and co curricular activities of colleges. It will also shatter the dreams of thousands of highly qualified youth waiting for an entry to the teaching



profession in higher education by way of recruitment by Kerala PSC and various educational agencies in the state. This will lead to a denial of chances to best talents to the teaching profession in higher education. This will have serious consequences on the quality of higher education in the state. We are to point out that some of these were reflected in the reactions to the Govt. decision as evident from the news appeared in media.

3. 16 മണിക്കൂറിൽ കുറവ് മാത്രം ജോലിഭാരം ഉണ്ടാവാൻ സാധ്യതയുള്ള സിംഗിൾ ഫാക്കൽറ്റി (മലയാളം, ഹിന്ദി മുതലായ വിഷയങ്ങളിൽ സ്ഥിരം തസ്തികകൾ ഇല്ലാതാവുന്നത്) ടി പഠന വിഭാഗങ്ങളെ എങ്ങനെ സ്വാധീനിക്കും? സിംഗിൾ ഫാക്കൽറ്റി വിഷയങ്ങൾക്ക് പ്രത്യേക പരിഗണന നൽകേണ്ടതുണ്ടോ?

As per Clause 3.(i) of the G.O(Ms)No.155/2020 of April 1,2020, *in all Aided Arts & Science Colleges in the State, workload of 16 hours per week is required for sanctioning and filling up of regular teaching posts.No regular teaching post will be allowed for a workload of less than 16 hours,even if it is a single faculty subject.Service of Guest lecturer alone will be permitted for subjects with a workload of less than 16 hours.*

The implementation of this clause will render all the teaching posts of single faculty subjects with less than 16 hours per week as supernumerary and all these subjects in future will have to be handled by Guest lecturers. This will lead to sharp decline in academic standards in the teaching of these subjects. In many colleges single faculty subjects are offered from emerging disciplines. Vanishing of regular teachers from these subjects will lead to a crisis in constituting academic bodies like Board of Studies, Board of Examiners etc. for these subjects at the University/Autonomous College level. Engagement of ad hoc Guest lecturers in these subjects will lead the students opting out such courses, ultimately adversely affecting their academic choices, prospects for employment and higher studies.The teaching and learning of Malayalam,Hindi,Arabic,Urdu,Sanskrit,French, Latin etc as Additional languages will be endangered by the above clause. Single faculty subjects and





additional languages need special consideration and full time regular teaching post is to be created even if the teaching hours are less than 16 hours per week in these subjects.

4. സംസ്ഥാനത്ത് നിലവിലുള്ള ജോലിഭാര നിബന്ധന യു.ജി.സി. മാർഗ്ഗ നിർദ്ദേശങ്ങളുമായും ചട്ടങ്ങളുമായും പൊരുത്തപ്പെടുന്നവയാണോ?

Removing P.G weightage is against the content and spirit of U.G.C Regulations on workload fixation as discussed below:

U.G.C Regulations 2010 was implemented in Kerala with effect from 18-09-2010. As per G.O (Ms)No. 87/2012/H.Edn dated 12/03/2012. Govt. of Kerala issued orders for the introducing of uniform norms for the fixation of workload /teaching staff in aided colleges. According to this order: "Government have examined the matter in detail and taking into account the UGC regulations and the suggestions put forwarded by the Kerala State Higher Education Council, decided to fix the following norms for the fixation of workload/teaching staff in Aided colleges.

<i>Assistant Professor</i>	<i>16 hrs (Under Graduate level)</i>
<i>Associate Professor &amp; Professor</i>	<i>14hrs (Under Graduate level)</i>

*(One hour of PG teaching would be treated as equivalent to 1.5 hrs of UG Teaching)*

<i>Maximum number of period for direct Teaching for Principal of PG/UG Colleges</i>	<i>3 to 5 hrs per week</i>
<i>Minimum number of hours required for single faculty full time teaching post</i>	<i>6 hrs per week</i>
<i>Minimum number of hours required for additional post in a subject</i>	<i>9 hrs per week</i>



*(In case where a teacher has to engage more than 18 hrs a week, the post of a part time lecturer may be created if the additional workload is less than 9hrs).*

*The above norms shall be strictly adhered to and the existing provision in the respective Statutes/Ordinances may be amended incorporating these norms”.*

The G.O dated 12/03/2012 cited above had brought uniformity in the norms for the fixation of workload/teaching staff in aided colleges. The UGC Regulations 2018 was also implemented in Kerala with the same clauses regarding workload fixation, as per G.O (P)No.18/2019/HEDN dated 29/06/2019. The G.O (Ms)No.155/2020 dated April 1, 2020 which replace the G.O dated 12/03/2012 states that PG weightage will not be considered since it is not provided under UGC Regulations. But there are other important clauses of the UGC Regulations related to the workload of teachers which the Govt. has conveniently overlooked and not implemented. For instance, as per as per section 15.0 sub section 15.1 of UGC Regulations 2010 it is stated as :

***The workload of the teachers in full employment should not be less than 40 hours a week for 30 working weeks (180 teaching days) in an academic year.It should be necessary for the teacher to be available for at least 5 hours daily in the University/College for which necessary space and infrastructure should be provided by the University /College.Direct teaching –learning process hours should be as follows:***

<b><i>Assistant Professor</i></b>	<b><i>16 hours</i></b>
<b><i>Associate Professor and Professor</i></b>	<b><i>14 hours.</i></b>

Similarly as per Section 15.1 of UGC Regulations 2018 also:

***the direct –teaching learning workload of should be as follows:***

<b><i>Assistant Professor</i></b>	<b><i>16 hours</i></b>
<b><i>Associate Professor/Professor</i></b>	<b><i>14 hours.</i></b>





The Govt.of Kerala has not implemented this workload norm of 14 hours for Associate Professor in the aided Arts & Science colleges of Kerala.

Similarly as per Section 6.5.0 of UGC Regulation 2010 there was provision for the appointment of Professors in Under Graduate and Post Graduate Colleges and Section 6.5.1.(i) specify that:

*ten percent of the number of the posts of Associate Professor in an Under Graduate shall be that of Professors and shall be subject the same criterion/appointment as that of Professors in Universities.*

As per section 6.5.2 of the same Regulation: *there shall be one post of Professor in each Department of a Post Graduate College which shall be subject to the same criterion for selection/appointment as that of professors in Universities,provided that one-fourth (25%) of the posts of Professor shall be filled on deputation/direct recruitment from among eligible teachers and the remaining three-fourths (75%) of posts shall be filled through merit promotion from among the eligible Associate Professors in the relevant department of the Post Graduate college.*

The Govt .of Kerala has not implemented this important part of the UGC Regulations 2010, which would have resulted in the career advancement of the highly meritorious eligible teachers working in Arts &Science Colleges

Govt. have also not implemented fully the provision for the appointment of Professor in Colleges, including Private and Constituent Colleges as stipulated in UGC Regulations 2018, as per the selection procedure laid down in Section VII of UGC Regulations 2018. Other provisions related to leave, age of superannuation etc., were also not implemented in our state.

Thus there is no justification for the clause (iii) of GO.No.155/2020 of April 1, 2020 that PG weightage will not be considered since it is not provided under



UGC Regulations, as it is clear that UGC Regulations with respect to workload of teachers and appointment of Professors in colleges were not implemented fully in the affiliated Arts & Science Colleges in Kerala.

Thus it is clear that removing PG weightage is against the spirit of UGC Regulations 2010 and UGC Regulations 2018.

5.01-04-2020-ലെ GO(MS)No.155/2020/HEDN ഉത്തരവ് പ്രകാരം 16 മണിക്കൂറിൽ താഴെ ജോലിഭാരമുള്ള തസ്തികകളിലുള്ള അധ്യാപകർ റിലീവ് ചെയ്യാൻ ടി തസ്തികകൾ ഇല്ലാതാവുമെന്നതിനാൽ അധ്യാപകർക്ക് അർഹതപ്പെട്ട സ്ഥലം മാറ്റങ്ങൾ ലഭ്യമാവാത്ത സ്ഥിതിയാണ് നിലവിലുള്ളത്. അധ്യാപകർക്ക് അർഹതപ്പെട്ട സ്ഥലംമാറ്റ അവകാശം തടസ്സം കൂടാതെ തുടർന്നും ലഭ്യമാവുന്നതിനുള്ള ശുപാർശ സമർപ്പിക്കുക

This is a serious issue to be resolved urgently. In several Corporate Managements teachers eligible for transfer are denied opportunity. When a post renders supernumerary on account of transfer on genuine grounds, such posts shall be protected irrespective of workload and Managements should be permitted to fill such vacancies either through direct recruitment or transfer.

## **Other Important Suggestions**

### **1. Work Load of Principals of Aided Colleges**

At present a workload of 3-5 hours in the concerned subject is insisted for the appointment of Principals in aided colleges. It is identified as a major constraint in the appointment of Principals and many Principals are forced to relinquish the post. In Govt. Colleges, workload is not essential for Principal appointment. This rule is to be made applicable to aided colleges also.

As per UGC Regulations, after the completion of the period of tenure appointment the Principal can rejoin the parent Department as Professor. Creation of the post of Professor in the parent Department of the college is essential for this.






## **2. Workload Issues Related to Training Colleges**

The teaching staff pattern of training colleges are based on NCTE norms. As per these norms, teaching posts in Performing Arts and Fine Arts are to be created in all training colleges offering B.Ed program. But in Kerala these posts have not been created so far. The workload norm of 16 hours is not to be applied to these colleges. Training colleges are to be permitted to appoint Guest faculty in these posts without reckoning workload, until permission is granted for regular appointment. Otherwise the quality of teacher education in our state will be adversely affected.

## **3. Workload Issues Related to Arabic Colleges**

The Arabic colleges/Oriental Title colleges of Kerala are in a phase of transition. They have been granted new courses and restructured existing courses. There are single faculty subjects including additional languages with less than 16 hours taught in these colleges. Full time regular teaching posts are to be created in these subjects. Post of Physical Education teacher is also to be created in these colleges.



Dr.M.Usman  
(General Secretary)



Dr.M.E.Kuriakose  
( President)

